

Robert A. Julian (SBN 99469)
Cecily A. Dumas (SBN 111449)
BAKER & HOSTETLER LLP
1160 Battery Street, Suite 100
San Francisco, CA 94111
Telephone: 628.208.6434
Facsimile: 310.820.8859
Email: rjulian@bakerlaw.com
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)
Lauren T. Attard (SBN 320898)
BAKER & HOSTETLER LLP
11601 Wilshire Boulevard
Suite 1400
Los Angeles, CA 90025
Telephone: 310.820.8800
Facsimile: 310.820.8859
Email: esagerman@bakerlaw.com
Email: lattard@bakerlaw.com

Counsel for Official Committee of Tort Claimants

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG& E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

**DECLARATION OF STEVEN M.
CAMPORA IN SUPPORT OF OFFICIAL
COMMITTEE OF TORT CLAIMANTS'
LIMITED JOINDER, OBJECTION AND
COUNTER MOTION TO DEBTORS'
WILDFIRE ASSISTANCE PROGRAM
MOTION (DKT. NO. 1777)**

Date: May 22, 2019

Time: 9:30 a.m. (Pacific Time)

Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 1. I, Steven M. Campora, am licensed to practice laws in the courts of the State of
2 California, and am a partner of the law firm of Dreyer Babich Buccola Wood & Campora LLP
3 (“**Dreyer Babich**”), resident in its Sacramento office. I have personal knowledge of the facts set
4 forth in this declaration and if called to testify, could and would competently testify thereto.

5 2. Dreyer Babich served as counsel to several plaintiffs who sued Pacific Gas and
6 Electric Company (“**PG&E**”) for damages sustained in the wildfire in Amador County and
7 Calaveras County in September 2015, that was determined to have been caused by PG&E's
8 electrical equipment. I received on behalf of those plaintiffs information from PG&E regarding
9 “PG&E's Offer of Assistance To Address Urgent Needs.”

10 3. Attached hereto as **EXHIBIT A** and incorporated herein by reference is a letter,
11 dated November 18, 2015, from counsel for PG&E to me and other counsel for residents impacted
12 by the Butte Fire regarding “PG&E’s Offer of Assistance to Address Urgent Needs.” The letter
13 included an attachment entitled “PG&E’s Offer of Assistance to Address Urgent Needs –
14 Description.”

15 4. Attached hereto as **EXHIBIT B** and incorporated herein by reference is a letter,
16 dated November 20, 2015, from FEMA to PG&E in which FEMA gave PG&E direction concerning
17 how PG&E's victims fund intersected with FEMA benefits.

18
19 I declare under penalty of perjury that the foregoing is true and correct. Executed on May 14, 2019.
20
21
22
23
24
25
26
27
28



Steven M. Campora